



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ALC/LHE/SME  
F. #2016R00505

271 Cadman Plaza East  
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December 26, 2017

**By ECF and Email**

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Re: United States v. Mark Nordlicht, et al.  
Criminal Docket No. 16-640 (BMC)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017, July 3, 2017, July 6, 2017, July 17, 2017, July 27, 2017, August 21, 2017, August 22, 2017, August 30, 2017, September 15, 2017, October 4, 2017 and November 7, 2017. The government again requests reciprocal discovery from the defendants.

The government has made available at First Choice Copy (“First Choice”), for reproduction to the defendants:

- Emails and other documents pertaining to the defendant Joseph SanFilippo that were recovered through the search executed at the offices of Platinum Partners (“Platinum”) on June 22, 2016 (the “June 2016 Search”):<sup>1</sup>  
EDNY-PP-SW1-014262502 – EDNY-PP-SW1-015663355;
- Electronic documents from Platinum’s server, including but not limited to spreadsheets, which were recovered through the June 2016 Search:<sup>2</sup>  
EDNY-PP-SW1-015663356 – EDNY-PP-SW1-015665935; and
- Electronic copies of emails and other documents produced by B Asset Manager LP:  
B000762688 – B000839024.

Very truly yours,

BRIDGET M. ROHDE  
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By:                     /s/                      
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cc: Clerk of the Court (BMC) (by ECF) (w/o enclosures)

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<sup>1</sup> The government recently learned that its vendor accidentally had moved the enclosed documents pertaining to SanFilippo to the Firewall Database for this case, despite their not containing any privilege search terms; accordingly, these documents inadvertently were not included in the government’s prior Rule 16 discovery productions. The vendor only recently discovered this inadvertent error.

<sup>2</sup> At the same time that it provided the government with the information set forth above, see supra note 1, the government’s vendor alerted the government that it inadvertently had excluded the enclosed subset of Platinum server documents from a prior production of Platinum server documents.